

COMPARISON OF LAKE TAHOE CGP REQUIREMENTS WITH STATE-WIDE CGP REQUIREMENTS

| General Permit Requirement | Description |
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| Eligible Projects | <p>State-Wide CGP includes two sets of requirements, one for conventional construction and one for linear underground/overhead (LUP) projects. The Tahoe CGP has one set of requirements for both conventional and LUP projects.</p> <p>There is no risk level in the Tahoe CGP. All projects are considered the same risk. Additionally, there is no option for an erosivity waiver in the Tahoe CGP</p> |
| Discharge Types Covered | <p>State-Wide CGP allows certain authorized non-storm water discharges to surface waters. In accordance with Lahontan Basin Plan, Tahoe CGP prohibits all non-storm water waste discharges to surface waters unless granted an exemption in accordance with Basin Plan policies. Exemptions may be granted for projects intended to reduce or mitigate existing sources of erosion, water pollution, or impairment of beneficial uses. Additionally, exemptions may be granted for certain discharges to Stream Environment Zones (SEZs) and 100-year floodplains in accordance with Basin Plan policies presented in Attachment F of the Tahoe CGP.</p> |
| Permit Registration Documents (PRDs) | <p>Registration is the same for both permits. Separate module for the Tahoe CGP is established in the SMARTS (<i>Region 6 South Lake Tahoe Permit</i>).</p> |
| Legally Responsible Person (LRP) | <p>LRP requirements are the same for both permits.</p> |
| QSD/QSP Qualifications | <p>QSD/QSP qualifications and certifications are the same for both permits.</p> |
| QSD/QSP Training and Testing Requirements | <p>QSD/QSP training requirement is geared to the State-Wide CGP. State Board-sponsored training generally does not address requirements of the Tahoe CGP unless specifically added by the Trainer of Record. QSD/QSP test does not include elements of the Tahoe CGP.</p> |
| Numeric Effluent Limitations (NELs) | <p>Discharge compliance points are the same for both permits. However, in accordance with the Basin Plan, Tahoe CGP includes NELs for iron, nitrogen, phosphorus, oil and grease, and turbidity. Samples are required to be sampled for turbidity using portable field meters. Other constituents must be sampled in accordance with non-visible pollutant sampling requirements.</p> <p>The NEL for turbidity is 20 NTU and there is no numeric action level (NAL) compared with the State-Wide CGP. A daily average turbidity level must be determined in the same manner as that required in the State Board CGP. A benchmark or action level for pH is set at 6.0 to 9.0.</p> |

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| Compliance Storm Event | <p>The compliance storm event for the Tahoe CGP is different than that set in the State-Wide CGP. Compliance with NELs is not required for pollutant concentrations that result from a 20-year, 1-hour storm event (1 inch of rain in a 1-hour period) or greater. This is geared toward the occurrence of summer thunderstorms, which can cause significant erosion in a short time frame during the active construction season. Supporting data including the time of sampling and the rain fall record from an on-site rain gauge or other nearby governmental agency is required for any claim of relief from the NELs.</p> |
| Best Management Practices (BMPs) | <p>The BMP requirements are essentially the same for both permits. The permit requires dischargers to implement appropriate BMPs from each of the following categories: 1) site management measures; 2) sediment and erosion controls; 3) dewatering controls (if applicable); 4) inspection, maintenance and repair, and 5) post-construction/LID measures.</p> <p>However, for the Tahoe CGP, land disturbing activities must cease by October 15 of each year, unless granted a variance. All projects must be winterized to prevent erosion during the period of October 16 through April 30 of the following year.</p> <p>For non-municipal projects, dischargers must demonstrate that post-construction controls will either infiltrate the 20-year, one-hour storm, meet numeric effluent limits in the Basin Plan, or be in compliance with municipal load reduction goals. Municipal construction projects must meet load reduction requirements set in the respective municipal NPDES permits in accordance with the Lake Tahoe TMDL.</p> |
| Storm Water Pollution Prevention Plan (SWPPP) | <p>SWPPP requirements are the same for both permits. A suggested outline for developing a SWPPP is provided in the Tahoe CGP.</p> |
| Rain Event Action Plan (REAP) | <p>The REAP trigger for the Tahoe CGP is a 30 percent chance of precipitation compared with a 50 percent chance in the State Board CGP. Additionally the REAP must be prepared at least 24 hours prior to predicted rain rather than 48 hours in the State Board CGP. The requirements are geared more toward thunderstorm activity in the Tahoe Basin.</p> |
| Construction Site Monitoring and Reporting Plan (CSMRP) | <p>Monitoring requirements in the Tahoe CGP include daily inspections rather than weekly in the State Board CGP. Non-storm water discharge inspections are included in the daily routine; therefore, there are no non-storm water-specific inspections. During the winter inactive period (October 16 through April 30), monthly inspections are required. Pre-rain storm, post rain storm, and during rain storm (for extended events) are also required. Snow events do not trigger visual inspections.</p> <p>The Tahoe CGP does not include a qualifying storm event. Sampling is required whenever there is a discharge off the project boundaries. Otherwise, the scheme is the same (i.e., all discharge</p> |

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| | <p>points must be sampled and a minimum of three samples must be collected per day). Sample analyses (turbidity and non-visibles) are the same for both permits. There is no receiving water sampling requirement in the Tahoe CGP.</p> <p>During the winter inactive period, a minimum of two rain events must be sampled.</p> |
| Reporting | <p>Reporting is the same for both permits except a final project completion report is required for the Tahoe CGP.</p> <p>The requirements include: 1) 24-hour reporting of an adverse condition resulting from a discharge (e.g., oil spill, unauthorized non-storm water discharge to surface waters, breach of perimeter controls, NEL violation); 2) reporting through SMARTS of all field data within 5 days (laboratory analyses within 5 days of receipt of the results; 3) annual reporting; and 4) final reporting upon project completion.</p> |
| Other Potential Requirements | <p>Biosassessment - Requirements are the same for both permits. Index period in Tahoe is July 1 through August 15.</p> <p>ATS – Requirements are the same for both permits, except the compliance storm event is the 20-year, 1-hour storm for the Tahoe CGP.</p> <p>Stream Environment Zones (SEZs)/Floodplains – The Lahontan Basin Plan contains certain prohibitions on waste discharges to SEZs and floodplains. Dischargers must identify whether their project includes non-storm water waste discharges or land disturbance to SEZs and/or floodplains in their NOI. Limited exemptions to the prohibitions may be applicable as detailed in Attachment F to the Tahoe CGP.</p> |